

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JENNIFER HASEMANN
and DEBBIE HOTH, individually
and on behalf of all others similarly situated,

Case No. 1:15-cv-02995-MKB-RER

Plaintiffs,

v.

GERBER PRODUCTS CO.,

Defendant.

JEREMY GREENE
and CETARIA WILKERSON, individually
and on behalf of all others similarly situated,

Case No. 1:16-cv-1153-MKB-RER

Plaintiffs,

v.

GERBER PRODUCTS CO.,

Defendant.

**PLAINTIFFS' NOTICE OF MOTION FOR APPOINTMENT OF
INTERIM CO-LEAD COUNSEL PURSUANT TO
FEDERAL CIVIL PROCEDURE RULE 23(g)**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Motion to Appoint Michael R. Reese of Reese LLP; E. Michelle Drake of Berger & Montague, P.C.; Brett Cebulash of Taus, Cebulash & Landau, LLP; and, John Yanchunis of Morgan & Morgan Complex Litigation Group as Interim Co-Lead Class Counsel, Plaintiffs Jennifer Hasemann, Debbie Hoth, Jeremy Greene and Cetaria Wilkerson (together, “Plaintiffs”), through their undersigned counsel, will and hereby do move this Court before the Honorable Margo K. Brodie of the Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order appointing Michael R. Reese of Reese LLP; E. Michelle Drake of Berger & Montague, P.C.; Brett Cebulash of Taus, Cebulash & Landau, LLP; and, John Yanchunis of Morgan & Morgan Complex Litigation Group, as interim co-lead counsel for a proposed nationwide class (not including California and Washington, D.C.) and for such further relief as this Court deems just and proper (the “Motion”).

Plaintiffs make this Motion pursuant to Rule 23(g)(3) of the Federal Rules of Civil Procedure and on the grounds that appointment of interim co-lead class counsel is appropriate at this time to “fairly and adequately represent the interests of the class” and because Michael R. Reese of Reese LLP; E. Michelle Drake of Berger & Montague, P.C.; Brett Cebulash of Taus, Cebulash & Landau, LLP; and, John Yanchunis of Morgan & Morgan Complex Litigation Group, will best represent the interests of the proposed nationwide class (not including California or Washington, D.C.). This Motion is based upon this notice of motion, the accompanying memorandum of law, all pleadings on file, and any additional briefing and argument presented to the Court before or at the hearing on this Motion.

Date: May 16, 2016

Respectfully submitted,

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By: /s/ Michael R. Reese

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